

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK BIOMETRIC	)	Master File No. 3:15-cv-3747-JD
INFORMATION PRIVACY LITIGATION	)	
	)	CLASS ACTION
	)	
	)	
This Document Relates to:	)	DECLARATION OF JOHN J. PENTZ
	)	IN SUPPORT OF MOTION OF
	)	OBJECTORS FRANKFOTHER AND
	)	FLANAGAN FOR ATTORNEY'S
	)	FEEES
	)	
ALL ACTIONS	)	
	)	
	)	
	)	
	)	
	)	

I, John J. Pentz, declare as follows:

1. I am an attorney licensed to practice in the Commonwealth of Massachusetts (BBO # 561907). I have been an active member of the State Bar of Massachusetts for 28 years, and my current business address is 19 Widow Rites Lane, Sudbury, MA 01776.
2. Along with attorney Kendrick Jan, I represent objectors Dawn Frankfother and Cathy Flanagan in the above-captioned matter, and make this declaration in support of Objectors' Motion for Attorney Fees.
3. I have expended at least 68.5 hours, as reflected in *Exhibit A*, in representing the interests of my clients in this matter, whose objections were brought for the purpose of benefiting all Class Members.
4. My time records were personally maintained by me, in hand-written form, on a legal notepad.

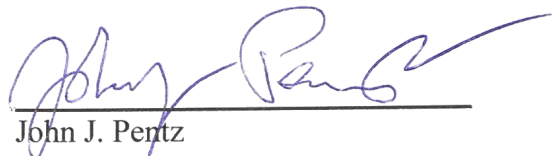
5. Attached hereto as *Exhibit A* is a statement of hours and description of tasks reflecting the time I spent in pursuit of my clients' position in this case.

6. My rate of \$900/hour is consistent with the Laffey Matrix, which prescribes a rate of \$914/hour for attorneys with greater than 20 years experience.

7. I have received no compensation for my work performed in this case to date.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 12, 2021



John J. Pertz

## EXHIBIT A

Statement of time and expenses of John J. Pentz in *In re Facebook Biometric Information Privacy Litigation*, No. 3:15-cv-3747-JD

<b>Date</b>	<b>Task</b>	<b>Hours</b>
10/1/20	Reviewed docket, settlement agreement, 9 <sup>th</sup> Cir decision And IL <i>Rosenbach</i> case, prelim approval order	4.5
10/21/20	Reviewed Fee Petition and Supporting Decs	1.5
11/2/20	Reviewed 2 preliminary approval hearing transcripts; Reviewed docket; further review of fee petition; attention to requested incentive awards	6.0
11/3/20	t/c/w KJ re: transcripts	0.25
11/6/20	t/c/w KJ	0.5
11/9/20	Reviewed supplemental memo in support of preliminary Approval	1.0
11/11/20	Reviewed KJ draft of objection	1.5
11/12/20	Zoom meeting w/KJ re: objection revisions	1.5
11/13/20	Zoom meeting w/KJ re revisions	1.25
11/18/20	Zoom meeting w/KJ re revisions	1.0
11/20/20	t/c/w KJ re final form of objections	0.25
11/21/20	Completed and filed PHV application	0.5
11/24/20	Reviewed other filed objections; reviewed Edelson email and t/c/w KJ re same; reviewed KJ draft of reply email and followups	2.0
11/25/20	Reviewed email from KJ re: CA law on retainer agts; Reviewed 7 <sup>th</sup> status report and followup email to KJ	0.75
11/30/20	Attn to Edelson emails; t/c/w KJ; research re Objector Depos, production of retainer agts	1.0
12/1/20	Reviewed Motions to take Depos of clients and to Shorten time; drafted opposition	1.5

12/2/20	Contd drafting opps to motion to shorten time and to Motion for leave to issue subpoenas; t/c/w KJ re same	3.5
12/3/20	Revised KJ edits of draft opp to mot for leave to issue Subpoenas; reviewed and revised client decs; drafted Declaration of JJP; Zoom call w/KJ re: opposing discovery	6.0
12/4/20	Reviewed final dox to be filed in support of opp to Subpoena motion	1.0
12/7/20	Reviewed CC's filings in support of settlement and fees	2.5
12/8/20	Zoom meeting w/KJ re CC's motion in support of Settlement and fees	0.5
12/9/20	Reviwed docket; attention to class size, references to class size in record; research into 7 <sup>th</sup> Circuit law on fees	1.5
12/14/20	Drafted opp to motion for final approval and fees	4.5
12/15/20	Research on choice of law in transferee court	1.5
12/16/20	Further review of Rubenstein and Fitzpatrick Decs in Support of fees; revised KJ edits of draft Opp. to Motion for final approval and fees	4.5
12/17/20	Final revisions to Opp. to Mot. For final approval	2.0
1/5/21	Reviewed CC's Reply to Opp	1.0
1/12/21	Reviewed cases cited in Reply and applicable law; t/c/w KJ re same	3.5
1/13/21	Research into CA cases similar to IL law on fees; Reviewed & shepardized <i>Optical Disk Drive</i> case; t/c/w KJ re: prep for FH	2.5
1/14/20	t/c/w KJ re prep for FH; drafted argument outline; Attended FH via Zoom	6.0
2/26/21	Reviewed Final Approval and Fee Order	2.0
3/2/21	t/c/w KJ re: Final Approval and Fee Order	1.0

<b>Total Hours</b>	<b>68.5</b>
<b>Total Lodestar (at \$900/hour)</b>	<b>\$61,650</b>